

Hearing Date and Time:
October 3, 2019 at 10:00 a.m.

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(*pro hac vice*)
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BH North American Corporation

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In re:

SEARS HOLDING CORPORATION, *et al.*,

Debtors.¹

-----X

Chapter 11

Case No. 18-23538 (RDD)

(Jointly Administered)

**JOINDER BY BH NORTH AMERICAN CORPORATION TO
SUPPLEMENTAL OBJECTION OF MIEN CO. LTD. *ET AL* TO
CONFIRMATION OF THE MODIFIED SECOND AMENDED JOINT
CHAPTER 11 PLAN OF SEARS HOLDINGS CORPORATION AND ITS
AFFILIATED DEBTORS AND TO
TERMINATE EXCLUSIVITY [DOC 5266]**

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are as follows: Sears Holdings Corporation (0798); Kmart Holding Corporation (3116); Kmart Operations LLC (6546); Sears Operations LLC (4331); Sears, Roebuck and Co. (0680); ServiceLive Inc. (6774); SHC Licensed Business LLC (3718); A&E LLC (0204); FBA Holdings Inc. (6537); Innovel Solutions, Inc. (7180); Kmart Corporation (9500); MaxServ, Inc. (7626); & Business Franchises, Inc. (6742); Sears Home Improvement Products, Inc. (8591); Sears Insurance Services, L.L.C. (7182); Sears Procurement Services, Inc. (2859); Sears Protection Company (1250); Sears Protection Company (PR) Inc. (4861); Sears Roebuck Acceptance Corp. (0535); Sears, Roebuck de Puerto Rico, Inc. (3626); SYW Relay LLC (1870); Wally Labs LLC (None); SHC Promotions LLC (9626); Big Beaver of Florida Development, LLC (None); California Builder Appliances, Inc. (6327); Florida Builder Appliances, Inc. (9133); KBL Holding Inc. (1295); KLC, Inc. (0839); Kmart of Michigan, Inc. (1696); Kmart of Washington LLC (8898); Kmart Stores of Illinois LLC (8897); Kmart Stores of Texas LLC (8915); MyGofer LLC (5531); Sears Brands Business Unit Corporation (4658); Sears Holdings Publishing Company, LLC (5554); Sears STI Merchandising, Inc. (0188); Troy Coolidge No. 13, LLC (None); BlueLight.com, Inc. (7034); Sears Brands, L.L.C. (4664); Sears Buying Services, Inc. (6533); Kmart.com LLC (9022); Sears Brands Management Corporation (5365); and SRe Holding Corporation (4816); The location of the Debtors' corporate headquarters is 3333 Beverly Road, Hoffman Estates, Illinois 60179.

TO THE HONORABLE ROBERT D. DRAIN,
UNITED STATES BANKRUPTCY JUDGE:

BH NORTH AMERICAN CORPORATION (“BH NA”), by its attorneys, Higgs, Fletcher & Mack LLP, submits this joinder to the supplemental objection of Mien Co. Ltd. *et al* to confirmation of the modified second amended joint chapter 11 plan (“Plan”) of Sears Holdings Corporation and its affiliated debtors and to terminate exclusivity (the “Mien Supplemental Objection”) [Doc 5266], and represents and says as follows:

1. BH NA is an administrative creditor of this estate. BH NA joins in and supports the Mien Supplemental Objection.

2. The Court should not confirm the Plan.

Dated: Saratoga Springs, New York
October 1, 2019

Respectfully submitted,

CARTER, CONBOY CASE,
BLACKMORE, MALONEY &
LAIRD, P.C.

/s/ Michael J. Catalfimo
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